

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
 v.) Criminal No. 04-30034-MAP
)
)
 MICHAEL CROOKER,)
 Defendant.)

Government's Motion for
an Order of Excludable Delay

(Assented To)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests that the Court enter an order of excludable delay in this case from February 23, 2005, until March 25, 2005, the date Mr. Crooker is scheduled to file his next pretrial motion.

The motion for excludable delay is appropriate because Mr. Crooker has requested that his lawyer, Vincent Bongiorno, Esq., file a motion to reconsider the Court's denial of his motion to dismiss the indictment. In addition, Mr. Bongiorno has stated that he will be filing a motion to suppress the seizure of evidence in this case. In order to permit the defendant the time he needs to file his motions, an order of excludable delay is appropriate.

The government and the defendant agree that it is in the best interests of the parties, the Court and the public that this period of time be excluded pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(8)(A).

Mr. Bongiorno assents to this motion.

Respectfully submitted,
MICHAEL J. SULLIVAN
United States Attorney

by: /s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

Date: February 25, 2005

Certificate of Service

February 25, 2005

I certify that on February 25, 2005, I caused the foregoing document to be mailed to counsel for the defendant, Vincent Bongiorno, Esq, 95 State Street, Springfield, MA 01103.

/s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney